

February 28, 2019

Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
17<sup>th</sup> floor 777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Mr. O'Hara:

**RE: PROPOSED AMENDMENT 1 TO THE GROWTH PLAN  
COMMENT SUBMISSION ON BEHALF OF JOHN STREET HOLDINGS  
2851 JOHN STREET, MARKHAM  
ERO NO. 013-4504  
OUR FILE Y378CI**

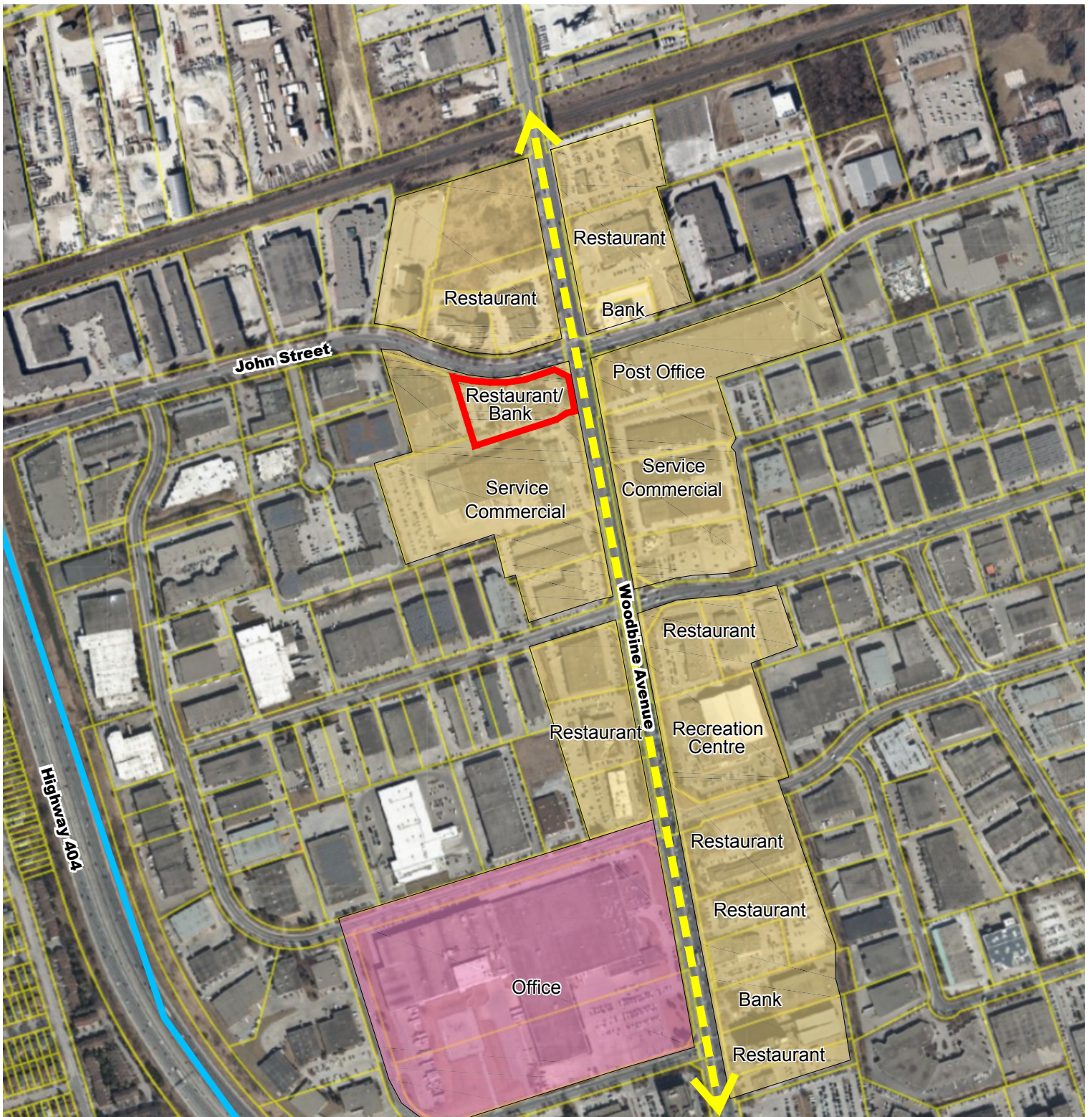
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We have been retained by John Street Holdings (hereinafter "Client") to review the proposed Amendment 1 to the Growth Plan for the property municipally addressed as 2851 John Street, Markham.

To become better informed and exchange comments on the Proposed Amendment 1 (hereinafter "Amendment") to the Growth Plan, MHBC has attended a number of Regional Workshops hosted by the Province.

Based on our review of the Amendment, it is understood that conversion of employment lands will continue to require a comprehensive assessment and the implications for economic development by the Ministry of Municipal Affairs and Housing (MMAH). The most significant proposed change is the introduction of Provincially Significant Employment Zones ("PSEZ") mapping across the GTA. We are concerned with the extent of this mapping and its accuracy vis-à-vis existing land uses and municipal Official Plan mapping.

Our client's lands have been included within the proposed PSEZ 7 (404 407 Markham). The subject lands are designated as "Service Employment" in the City of Markham 2014 Official Plan. The subject lands are used for office and service commercial uses (e.g., banks, restaurants) and located within the Woodbine Avenue Corridor. The Woodbine Avenue Corridor as a whole consists of similar commercial uses (**Figure 1**), specifically, restaurants, banks, office and service commercial uses providing daily amenities to businesses and residents located further east and south of the property.



Data Source: Government of Ontario- Proposed Provincially Significant Employment Zones Web Mapping (2018)

**Figure 1**  
**Proposed Provincially Significant Employment Zones**

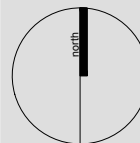
**LEGEND**

- Subject Lands
- Proposed Provincially Significant Employment Zones
- Service Employment
- Commercial

Woodbine Avenue Regional Transit Priority Corridor

DATE: February 27, 2019

SCALE 1:7500



**2851 John Street**  
**Markham, Ontario**

N:\Y378\CI - Newmarket OPA 10\2019\Figures\CAD\Y378C - Figure Mapping 25 February 2019 - dwg

The designation of a PSEZ is intended to protect major or heavy industrial uses, which do not match the commercial uses on the property or the character of Woodbine Avenue.

The purpose and intent of the property's Service Employment designation is to accommodate uses that serve and support other business uses and employees. Furthermore, the purpose of the service employment designation is to transition previously designated industrial sites to small-scale office and service employment uses. This transition is predominant at the intersection of John Street and Woodbine Avenue and along the Woodbine Corridor, where a number of industrial buildings have been converted to restaurants, banks and offices. The Region of York has identified Woodbine Avenue as a "Regional Transit Priority Network" which the property has frontage on.

As the property is adjacent to a planned intensification corridor, which has been identified by the Regional Official Plan and Markham Official Plan for further growth and intensification through high-order transit and increased densities, the proposed PSEZ on the property would limit the potential for development on site within a transit priority network and would not accurately reflect the existing or planned context of these lands. Therefore we request that the property be removed from the PSEZ.

**We request the property be removed from the PSEZ to enable these lands to realize the increased density and investment with a mix of uses as intended by the Official Plan.** In addition, we request that additional consultation be undertaken to ensure the mapping is accurate, and we request that the Province undertake further consultation with affected landowners on PSEZ mapping where municipalities have requested increased PSEZ limits which was not the property of this consultation.

We appreciate your attention to this matter and hope that our request to correct this mapping is undertaken.

Thank you.

Yours truly,

**MHBC**



David A. McKay, BES, MSc, MLAI, MCIP, RPP  
Vice President & Partner

cc.; *S. Bishop*